

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, et al.,

Plaintiffs

v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, et al.,

Defendants

**Civil No. 3:23-cv-00376
Judge Richardson**

Judge Newbern

JOINT MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiffs and Defendants hereby jointly move this Court to enter the proposed and agreed upon Protective Order, attached as Exhibit A. In support of this Motion, the Parties state as follows:

1. This Court has broad authority to regulate discovery and to enter in protective orders pursuant to Federal Rule of Civil Procedure 26.
2. The Parties agree that discovery in this matter will involve the disclosure or production of certain documents, things, and information, by one or more parties, that constitute or contain confidential information, trade secrets, or other priority information within the meaning of Rule 26(c) of the Federal Rules of Civil Procedure, and which should be protected by way of an appropriate protective order.
3. The Parties desire to prevent unnecessary dissemination or disclosure of the confidential information.

4. Based upon the foregoing, the Parties agree to abide by the provisions and protections set forth in the proposed Protective Order attached as Exhibit A.

Dated: May 5, 2023

/s/ Stella Yarbrough

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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2023, the undersigned filed the foregoing Joint Motion for Protective Order via this Court's electronic filing system, which sent notice of such filing to the following counsel of record:

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